

LAW OFFICES
ALBRIGHT, STODDARD, WARNICK & ALBRIGHT
A PROFESSIONAL CORPORATION
QUAIL PARK, SUITE D-4
801 SOUTH RANCHO DRIVE
LAS VEGAS, NEVADA 89106
LAS VEGAS, NEVADA 89106

G. MARK ALBRIGHT, ESQ. (#001394)
JORGE L. ALVAREZ, ESQ. (#014466)
ALBRIGHT, STODDARD, WARNICK & ALBRIGHT
801 South Rancho Drive, Suite D-4
Las Vegas, Nevada 89106
Tel: (702) 384-7111
Fax: (702) 384-0605
gma@albrightstoddard.com
jalvarez@albrightstoddard.com

Attorneys for Plaintiffs Judy Sabella and Timothy Sabella

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JUDY SABELLA, individually, and TIMOTHY
SABELLA, individually,

Plaintiffs,

vs.

WYNDHAM VACATION RESORTS, INC.;
JOHN DOES 1-50, and ROE CORPORATIONS 1-
15, inclusive.

Defendant.

Case No.: 2:21-cv-01016-GMN-DJA

**STIPULATION AND [PROPOSED]
ORDER TO DISMISS WITH
PREJUDICE**

Plaintiffs, JUDY SABELLA and TIMOTHY SABELLA (“Plaintiffs”), and Defendant
WYNDHAM VACATION RESORTS, INC. (“Defendant”) (collectively the “Parties”), by and
through their respective counsels of record, pursuant to Fed. R. Civ. P. 41(a)(1)(ii), hereby
stipulate and agree as follows:

1. Pursuant to an executed settlement agreement between the Parties, all claims asserted by
Plaintiffs herein shall be dismissed with prejudice; and

2. Each party shall bear its own attorneys’ fees and costs, except as set forth in the Parties’
settlement agreement.

///

1 DATED this 26th day of October, 2021.

DATED this 26th day of October, 2021.

2 **ALBRIGHT, STODDARD, WARNICK**
3 **& ALBRIGHT**

ARMSTRONG TEASDALE LLP

4 /s/ Jorge L. Alvarez, Esq.

/s/ Michelle D. Alarie, Esq.

5 G. MARK ALBRIGHT, ESQ., #1394
6 JORGE L. ALVAREZ, ESQ., #14466
801 South Rancho Drive, Suite D4
Las Vegas, Nevada 89106
T: 702.384.7111 / F: 702.384.0605
7 *Attorneys for Plaintiffs*

MICHELLE D. ALARIE, ESQ.
Nevada Bar No. 11894
3770 Howard Hughes Parkway, Suite
200 Las Vegas, Nevada 89169
T: 702.678.5070 / F: 702.878.9995
8 *Attorneys for Defendants*

9 **ORDER**

10 Based on the parties' stipulation, and good cause appearing, IT IS HEREBY ORDERED
11 that this action is dismissed with prejudice, each side to bear its own fees and costs. The Clerk of
12 Court is directed to close this case.

13
14
15 **IT IS SO ORDERED.**

16 Dated this 28 day of October 2021.

17
18 
19 Gloria M. Navarro, District Judge
20 UNITED STATES DISTRICT COURT
21
22
23
24
25
26
27
28

From: Jorge Alvarez
To: Andrea Brebbia
Subject: FW: Wyndham Signed Agreement [IWOV-IDOCS.FID4246209]
Date: Tuesday, October 26, 2021 10:24:35 AM
Attachments: image002.png

From: Michelle D. Alarie <MAlarie@atltp.com>
Sent: Tuesday, October 26, 2021 10:17 AM
To: Jorge Alvarez <jalvarez@albrightstoddard.com>
Subject: RE: Wyndham Signed Agreement [IWOV-IDOCS.FID4246209]

Good morning Jorge,

Only change I would propose is to change Magistrate Judge to District Judge on the signature block. With that change, you have my permission to affix my electronic signature for filing.

Thank you,



**Armstrong
Teasdale**

Armstrong Teasdale LLP
Michelle D. Alarie | Senior Associate Attorney
DIRECT: 702.415.2946 | FAX: 702.977.7483 | MAIN OFFICE: 702.678.5070

COVID-19 RESOURCE CENTER

*** Please note my new email address, malarie@atltp.com ***

From: Jorge Alvarez <jalvarez@albrightstoddard.com>
Sent: Tuesday, October 26, 2021 9:56 AM
To: Michelle D. Alarie <MAlarie@atltp.com>
Subject: FW: Wyndham Signed Agreement [IWOV-IDOCS.FID4246209]

Michelle,

Please see attached the proposed SAO.

Thanks,

Jorge L. Alvarez, Esq.
Albright, Stoddard, Warnick & Albright
801 So. Rancho Dr., Suite D-4
Las Vegas, NV 89106
Phone (702) 384-7111